



FRED WILLIAMSON & ASSOCIATES, INC.
Telecommunications Management Services

VIA ECFS

June 29, 2015

Ms. Marlene H. Dortch, Secretary
Federal Communications Commission
Office of Secretary
445 12th Street, S. W.
Washington, D.C. 20554

RE: Submission of information Pursuant to FCC 54.313 Rules and Request for Confidential Treatment – ETC Annual Reports and Certifications WC Docket No. 1458

Dear Ms. Dortch:

In accordance with the annual reporting requirements of 47 C.F.R. §§54.313 and 54.422, Pine Telephone Company, Inc. ("Pine"), Oklahoma, Study Area Code 432017, is submitting a completed FCC Form 481 to the Commission via its Electronic Comment Filing System (ECFS) in WC Docket No. 1458. Pine, by its authorized representative, hereby requests confidential treatment of two attachments to its FCC Form 481: (1) the five-year service quality improvement plan identified on Form 100, Line 112 and (2) the financial annual report identified on Form 3005, both of which were redacted in the ECFS submission. The request for confidential treatment of the five-year plan is being made pursuant to section 0.459 of the Commission's rules and Exemption 4 of the Freedom of Information Act (FOIA). The request for confidential treatment of the financial annual report is being made pursuant to the FCC's June 17, 2015 Protective Order in WC Docket No. 1458. These attachments contain competitively sensitive data that Pine maintains as confidential and does not normally make available to the public. Release of this information would have a substantial negative impact on the Company.

Pine is also transmitting the following information to the Commission in compliance with C.F.R. §§54.313 and 54.422:

- Submission to the Office of the Secretary, this cover letter and the Form 481 filing which includes the confidential information that is being requested to be withheld from public inspection. Confidential information has been designated in accordance with Confidentiality guidelines and the Protective Order.
- Two copies of the Form 481 filing in redacted form and an accompanying cover letter are also being provided with the confidential filing.
- Two copies of this cover letter and the Form 481 filing with the confidential information are also being delivered to Mr. Charles Tyler, Telecommunications Access Policy Division, Wireline Competition Bureau.

121 East College Street • Broken Arrow, OK 74012 • 918-298-1618

REDACTED FOR PUBLIC INSPECTION

The confidential information has also been submitted to the Universal Service Administrative Company through its E-File system as an attachment to the FCC Form 481. Pine requests that the information contained in its five-year service quality improvement plan be withheld from public inspection because it contains competitively sensitive commercial and financial information that the Company keeps confidential. Public availability of this information would have a substantial negative impact on the Company. Pine offers the following information pursuant to section 0.459 of the Commission's rules and Exemption 4 of FOIA in support of this request:

(1) Identification of the specific information for which confidential treatment is sought:

Attachment to Line 112 of FCC Form 481 – Five-Year Service Quality Improvement Plan. Specifically, confidential treatment is sought for all information in the five-year plan related to the Company's future network plans and information concerning future services provided to customers.

(2) Identification of the Commission proceeding in which the information was submitted or a description of the circumstances giving rise to the submission:

The information was submitted in WC Docket Nos. 10-90 and 11-42 as an attachment to FCC Form 481- the Carrier Annual Reporting Data Collection Form. Section 100 of FCC Form 481 requires incumbent local exchange carriers receiving high cost support to attach a five-year service quality improvement plan, pursuant to 47 C.F.R. §§54.202(a)(1)(ii) and 54.313(a)(1).

(3) Explanation of the degree to which the information is commercial or financial, or contains a trade secret or is privileged:

The five-year service quality improvement plan contains information on the Company's future plans, number of customers served and other planning information that company does not make publicly available.

(4) Explanation of the degree to which the information concerns a service that is subject to competition:

Broadband is subject to increasing competition in the areas served by rural, rate-of-return incumbent local exchange carriers (RLECs). Virtually all RLECs face competition from one or more Internet service providers.

(5) Explanation of how disclosure of the information could result in substantial competitive harm:

Disclosure of the information contained in the five-year plan would provide competitors with detailed, granular information regarding the Company's strategic plans. This would provide competitors access to confidential information they could employ to develop their own plans a particular service area. This could cause competitive harm to the Company.

(6) Identification of any measures taken by the submitting party to prevent unauthorized disclosure:

The Company has continually treated information regarding its network and service plans as confidential and carefully controls the information to protect it from competitors.

(7) Identification of whether the information is available to the public and the extent of any previous disclosure of the information to third parties:

The redacted information in the five-year plan is not available to the public, and third party access is limited as described in (6) above.

(8) Justification of the period during which the submitting party asserts that material should not be available for public disclosure:

The Company requests that the extracted information be withheld from public inspection indefinitely. The five year planning period information would provide valuable information to competitors for several years beyond that period.

(9) Any other information that the party seeking confidential information treatment believes may be useful in assessing whether its request for confidentiality should be granted:

Exemption 4 of FOIA shields from public disclosure commercial or financial information obtained from a person that is privileged or confidential. Based on the responses provided above, the information in question satisfies this test.

Please contact me if you have any questions.

Sincerely,



Tim Morrissey
President
314-605-9220
tmorrissey@fwainc.com

Enclosures

cc: Mr. Charles Tyler, Telecommunications Access Policy Division, Wireline Competition Bureau, Federal Communications Commission, (2 hardcopies of confidential submission)

**FCC Form 481 - Carrier Annual Reporting
Data Collection Form**

 FCC Form 481
 OMB Control No. 3060-0986/OMB Control No. 3060-0819
 July 2013

<010>	Study Area Code	432017
<015>	Study Area Name	PINE TELEPHONE CO
<020>	Program Year	2016
<030>	Contact Name: Person USAC should contact with questions about this data	JANE MERZ
<035>	Contact Telephone Number: Number of the person identified in data line <030>	5805843355 ext.
<039>	Contact Email Address: Email of the person identified in data line <030>	jane@pinetelephone.com

ANNUAL REPORTING FOR ALL CARRIERS		54.313 Completion Required	54.422 Completion Required
		(check box when complete)	
<100>	Service Quality Improvement Reporting (complete attached worksheet)	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<200>	Outage Reporting (voice) (complete attached worksheet)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<210>	<input checked="" type="checkbox"/> <-- check box if no outages to report	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<300>	Unfulfilled Service Requests (voice) <input type="text" value="0"/>	<input type="checkbox"/>	<input type="checkbox"/>
<310>	Detail on Attempts (voice) <div style="border: 1px solid black; height: 40px; width: 250px;"></div> (attach descriptive document)	<input type="checkbox"/>	<input type="checkbox"/>
<320>	Unfulfilled Service Requests (broadband) <input type="text" value="0"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<330>	Detail on Attempts (broadband) <div style="border: 1px solid black; height: 40px; width: 250px;"></div> (attach descriptive document)	<input type="checkbox"/>	<input type="checkbox"/>
<400>	Number of Complaints per 1,000 customers (voice)		
<410>	Fixed <input type="text" value="0.0"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<420>	Mobile <input type="text" value="0.0"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<430>	Number of Complaints per 1,000 customers (broadband)		
<440>	Fixed <input type="text" value="0.0"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<450>	Mobile <input type="text" value="0.0"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<500>	Service Quality Standards & Consumer Protection Rules Compliance (check to indicate certification)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<510>	<div style="border: 1px solid black; height: 40px; width: 250px;"></div> (attached descriptive document)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<600>	Functionality in Emergency Situations (check to indicate certification)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<610>	<div style="border: 1px solid black; height: 40px; width: 250px;"></div> (attached descriptive document)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<700>	Company Price Offerings (voice) (complete attached worksheet)	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<710>	Company Price Offerings (broadband) (complete attached worksheet)	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<800>	Operating Companies and Affiliates (complete attached worksheet)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<900>	Tribal Land Offerings (Y/N)? <input checked="" type="radio"/> <input type="radio"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<1000>	Voice Services Rate Comparability Certification (if yes, complete attached worksheet) Yes <input type="text" value=""/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<1010>	<div style="border: 1px solid black; height: 40px; width: 250px;"></div> (attach descriptive document)	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<1100>	Certify whether terrestrial backhaul options exist (Yes or No) <input checked="" type="radio"/> <input type="radio"/> (if not, check to indicate certification)	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<1110>	(complete attached worksheet)	<input type="checkbox"/>	<input type="checkbox"/>
<1200>	Terms and Condition for Lifeline Customers (complete attached worksheet)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Price Cap Carriers, Proceed to Price Cap Additional Documentation Worksheet			
Including Rate-of-Return Carriers affiliated with Price Cap Local Exchange Carriers			
<2000>	(check to indicate certification)	<input type="checkbox"/>	<input type="checkbox"/>
<2005>	(complete attached worksheet)	<input type="checkbox"/>	<input type="checkbox"/>
Rate of Return Carriers, Proceed to ROR Additional Documentation Worksheet			
<3000>	(check to indicate certification)	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<3005>	(complete attached worksheet)	<input checked="" type="checkbox"/>	<input type="checkbox"/>

**(100) Service Quality Improvement Reporting
Data Collection Form**

 FCC Form 481
 OMB Control No. 3060-0986/OMB Control No. 3060-0819
 July 2013

<010>	Study Area Code	432017
<015>	Study Area Name	PINE TELEPHONE CO
<020>	Program Year	2016
<030>	Contact Name - Person USAC should contact regarding this data	JANE MERZ
<035>	Contact Telephone Number - Number of person identified in data line <030>	5805843355 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	jane@pinetelephone.com

<110>	Has your company received its ETC certification from the FCC?	(yes / no)	<input type="radio"/>	<input checked="" type="radio"/>
<111>	If your answer to Line <110> is yes, do you have an existing §54.202(a) "5 year plan" filed with the FCC?	(yes / no)	<input type="radio"/>	<input type="radio"/>

If your answer to Line <111> is yes, then you are required to file a progress report, on line <112> delineating the status of your company's existing § 54.202(a) "5 year plan" on file with the FCC, as it relates to your provision of voice telephony service.

<112> Attach Five-Year Service Quality Improvement Plan or, in subsequent years, your annual progress report filed pursuant to 47 C.F.R. § 54.313(a)(1). If your company is a CETC which only receives frozen support, your progress report is only required to address voice telephony service.

432017OK112.pdf

Name of Attached Document

Please select the appropriate responses below (Yes, No, Not Applicable) to confirm that the attached document(s), on line 112, contains a progress report on its five-year service quality improvement plan pursuant to §54.202(a). The information shall be submitted at the wire center level or census block as appropriate.

<113> Maps detailing progress towards meeting plan targets
 <114> Report how much universal service (USF) support was received
 <115> How much (USF) was used to improve service quality and how support was used to improve service quality
 <116> How much (USF) was used to improve service coverage and how support was used to improve service coverage
 <117> How much (USF) was used to improve service capacity and how support was used to improve service capacity
 <118> Provide an explanation of network improvement targets not met in the prior calendar year.

Yes
Yes
Yes
Yes
Yes
Not Applicable

[illegible]

<010>	Study Area Code	432017
<015>	Study Area Name	PINE TELEPHONE CO
<020>	Program Year	2016
<030>	Contact Name - Person USAC should contact regarding this data	JANE MERE
<035>	Contact Telephone Number - Number of person identified in data line <030>	5805843355 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	jane@pinetelephone.com

[illegible]

(900) Tribal Lands Reporting
Data Collection FormFCC Form 481
OMB Control No. 3060-0986 OMB Control No. 3060-0819
July 2013

<010> Study Area Code 432017
 <015> Study Area Name PINE TELEPHONE CO
 <020> Program Year 2016
 <030> Contact Name - Person USAC should contact regarding this data JANE MERZ
 <035> Contact Telephone Number - Number of person identified in data line <030> 5805843355 ext.
 <039> Contact Email Address - Email Address of person identified in data line <030> jane@pinetelephone.com

<910> Tribal Land(s) on which ETC Serves

CHOCTAW & CHICKASAW

<920> Tribal Government Engagement Obligation

432017OK920.pdf

Name of Attached Document

If your company serves Tribal lands, please select (Yes, No, NA) for each these boxes to confirm the status described on the attached document(s), on line 920, demonstrates coordination with the Tribal government pursuant to § 54.313(a)(9) includes:

<921> Needs assessment and deployment planning with a focus on Tribal community anchor institutions.
 <922> Feasibility and sustainability planning;
 <923> Marketing services in a culturally sensitive manner;
 <924> Compliance with Rights of way processes
 <925> Compliance with Land Use permitting requirements
 <926> Compliance with Facilities Siting rules
 <927> Compliance with Environmental Review processes
 <928> Compliance with Cultural Preservation review processes
 <929> Compliance with Tribal Business and Licensing requirements.

Select Yes or No or Not Applicable
Not Applicable
Not Applicable
Not Applicable
Not Applicable
Not Applicable
Not Applicable
Not Applicable
Not Applicable
Not Applicable

(1100) No Terrestrial Backhaul Reporting
Data Collection Form

FCC Form 481
OMB Control No. 3060-0986 OMB Control No. 3060-0819
July 2013

<010>	Study Area Code	432017
<015>	Study Area Name	PINE TELEPHONE CO
<020>	Program Year	2016
<030>	Contact Name - Person USAC should contact regarding this data	JANE MERZ
<035>	Contact Telephone Number - Number of person identified in data line <030>	5805843355 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	jane@pinetelephone.com

<1120> Please confirm whether terrestrial backhaul options exist within the supported area pursuant to § 54.313(g) (Yes, No).

<1130> Please select the appropriate response (Yes, No, Not Applicable) to confirm the reporting carrier offers broadband service of at least 1 Mbps downstream and 256 kbps upstream within the supported area pursuant to § 54.313(g).

(1200) Terms and Condition for Lifeline Customers
Lifeline
Data Collection Form

FCC Form 481
OMB Control No. 3060-0986 OMB Control No. 3060-0819
July 2013

<010>	Study Area Code	432017
<015>	Study Area Name	PINE TELEPHONE CO
<020>	Program Year	2016
<030>	Contact Name - Person USAC should contact regarding this data	JANE MERZ
<035>	Contact Telephone Number - Number of person identified in data line <030>	5805843355 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	jane@pinetelephone.com

<1210> Terms & Conditions of Voice Telephony Lifeline Plans

432017OK1210.pdf

Name of Attached Document

<1220> Link to Public Website

HTTP

"Please check these boxes below to confirm that the attached document(s), on line 1210, or the website listed, on line 1220, contains the required information pursuant to § 54.422(a)(2) annual reporting for ETOs receiving low-income support, carriers must annually report:

<1221> Information describing the terms and conditions of any voice telephony service plans offered to Lifeline subscribers, ☒

<1222> Details on the number of minutes provided as part of the plan, ☒

<1223> Additional charges for toll calls, and rates for each such plan. ☒

(2000) Price Cap Carrier Additional Documentation
Data Collection Form
Including Rate-of-Return Carriers affiliated with Price Cap Local Exchange Carriers

FCC Form 481
OMB Control No. 3060-0986 OMB Control No. 3060-0819
July 2013

<010>	Study Area Code	432017
<015>	Study Area Name	
<020>	Program Year	FINE TELEPHONE CO
<030>	Contact Name - Person USAC should contact regarding this data	2016
<035>	Contact Telephone Number - Number of person identified in data line <030>	JANE MERZ
<039>	Contact Email Address - Email Address of person identified in data line <030>	3605845355 ext. jane@pinetelphone.com

Select the appropriate responses below (Yes, No, Not Applicable) to note compliance as a recipient of Incremental Connect America Phase I support, frozen High Cost support, High Cost support to offset access charge reductions, and Connect America Phase II support as set forth in 47 CFR § 54.313(b),(c),(d),(e). The information reported on this form and in the documents attached below is accurate.

Incremental Connect America Phase I reporting

- <2010> 2nd Year Certification (47 CFR § 54.313(b)(1)i)
<2011a> 3rd Year Certification (47 CFR § 54.313(b)(1)ii)
<2011b> Attachment (47 CFR § 54.313(b)(1)ii)

Name of Attached Document(s) Listing Required Information

Price Cap Carrier Receiving Frozen Support Certification (47 CFR § 54.312(a))

- <2012> 2013 Frozen Support Calculation (47 CFR § 54.313(c)(1))
<2013> 2014 Frozen Support Calculation (47 CFR § 54.313(c)(2))
<2014> 2015 Frozen Support Calculation (47 CFR § 54.313(c)(3))
<2015> 2016 and future Frozen Support Calculation (47 CFR § 54.313(c)(4))

Price Cap Carrier Connect America ICC Support (47 CFR § 54.313(d))
Certification Support Used to Build Broadband

- <2016>
<2017> Connect America Phase II Reporting (47 CFR § 54.313(e))
3rd year Broadband Service Certification
<2018> 5th year Broadband Service Certification
<2019> Interim Progress Certification

- <2020> Please check the box to confirm that the attached document(s), on line 2021, contains the required information pursuant to § 54.313 (e)(3)(ii), as a recipient of CAF Phase II support shall provide the number, names, and addresses of community anchor institutions to which began providing access to broadband service in the preceding calendar year.

--

- <2021> Interim Progress Community Anchor Institutions

Name of Attached Document(s) Listing Required Information

(3000) Rate Of Return Carrier Additional Documentation
Data Collection Form

FCC Form 481
OMB Control No. 3060-0986 OMB Control No. 3060-0819
July 2013

<010> Study Area Code 432017
<015> Study Area Name PINE TELEPHONE CO
<020> Program Year 2016
<030> Contact Name - Person USAC should contact regarding this data JANE MERZ
<035> Contact Telephone Number - Number of person identified in data line <030> 5805843355_ext.
<039> Contact Email Address - Email Address of person identified in data line <030> jane@pinetelephone.com

CHECK the boxes below to note compliance on its five year service quality plan (pursuant to 47 CFR § 54.202(a)) and, for privately held carriers, ensuring compliance with the financial reporting requirements set forth in 47 CFR § 54.313(f)(2). I further certify that the information reported on this form and in the documents attached below is accurate.

- (3010) Progress Report on 5 Year Plan
Milestone Certification (47 CFR § 54.313(f)(1)(i))

432017OK3010.pdf

Name of Attached Document Listing Required Information

- (3011) Please check this box to confirm that the attached document(s), on line 3012 contains the required information pursuant to § 54.313(f)(1)(ii), the carrier shall provide the number, names, and addresses of community anchor institutions to which began providing access to broadband service in the preceding calendar year. ☒

432017OK112.pdf

- (3012) Community Anchor Institutions (47 CFR § 54.313(f)(1)(ii))

Name of Attached Document Listing Required Information

- (3013) Is your company a Privately Held ROR Carrier (47 CFR § 54.313(f)(2))
(3014) If yes, does your company file the RUS annual report

(Yes/No) ☒ ☒
(Yes/No) ☒ ☒

Please check these boxes to confirm that the attached document(s), on line 3017, contains the required information pursuant to § 54.313(f)(2) compliance requires:

- (3015) Electronic copy of their annual RUS reports (Operating Report for Telecommunications Borrowers) ☒
(3016) Document(s) for Balance Sheet, Income Statement and Statement of Cash Flows ☒

- (3017) If the response is yes on line 3014, attach your company's RUS annual report and all required documentation

432017OK3017.pdf

Name of Attached Document Listing Required Information

- (3018) If the response is no on line 3014, Is your company audited?

(Yes/No) ☐ ☐

If the response is yes on line 3018, please check the boxes below to confirm your submission, on line 3026 pursuant to § 54.313(f)(2), contains

- (3019) Either a copy of their audited financial statement; or (2) a financial report in a format comparable to RUS Operating Report for Telecommunications ☐
(3020) Document(s) for Balance Sheet, Income Statement and Statement of Cash Flows ☐
(3021) Management letter and audit opinion issued by the independent certified public accountant that performed the company's financial audit ☐
If the response is no on line 3018, please check the boxes below to confirm your submission, on line 3026 pursuant to § 54.313(f)(2), contains

- (3022) Copy of their financial statement which has been subject to review by an independent certified public accountant; or (2) a financial report in a format comparable to RUS Operating Report for Telecommunications Borrowers, ☐
(3023) Underlying information subjected to a review by an independent certified public accountant ☐
(3024) Underlying information subjected to an officer certification. ☐
(3025) Document(s) for Balance Sheet, Income Statement and Statement of Cash Flows ☐

- (3026) Attach the worksheet listing required information

Name of Attached Document Listing Required Information

(3000) Rate Of Return Carrier Additional Documentation (Continued)

FCC Form 481

Data Collection Form

OMB Control No. 3060-0986; OMB Control No. 3060-0819

July 2013

<010> Study Area Code	432017
<015> Study Area Name	PINE TELEPHONE CO
<020> Program Year	2016
<030> Contact Name - Person USAC should contact regarding this data	JANE MERZ
<035> Contact Telephone Number - Number of person identified in data line <030>	5805843355_ext.
<039> Contact Email Address - Email Address of person identified in data line <030>	jane@pinetelephone.com

Financial Data Summary

(3027) Revenue

9916115

(3028) Operating Expenses

11209725

(3029) Net Income

1618157

(3030) Telephone Plant In Service (TPIS)

64191002

(3031) Total Assets

90648431

(3032) Total Debt

12672795

(3033) Total Equity

53959123

(3034) Dividends

133000

Name of Attached Document Listing Required Information

Certification - Reporting Carrier Data Collection Form	FCC Form 481 OMB Control No. 3060-0986; OMB Control No. 3060-0819 July 2013
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<010> Study Area Code	432017
<015> Study Area Name	PINE TELEPHONE CO
<020> Program Year	2016
<030> Contact Name - Person USAC should contact regarding this data	JANE MERZ
<035> Contact Telephone Number - Number of person identified in data line <030>	5805843355 ext.
<039> Contact Email Address - Email Address of person identified in data line <030>	jane@pinetelephone.com

TO BE COMPLETED BY THE REPORTING CARRIER IF THE REPORTING CARRIER IS FILING ANNUAL REPORTING ON ITS OWN BEHALF:

Certification of Officer as to the Accuracy of the Data Reported for the Annual Reporting for CAF or LI Recipients	
I certify that I am an officer of the reporting carrier; my responsibilities include ensuring the accuracy of the annual reporting requirements for universal service support recipients; and, to the best of my knowledge, the information reported on this form and in any attachments is accurate.	
Name of Reporting Carrier:	
Signature of Authorized Officer:	Date
Printed name of Authorized Officer:	
Title or position of Authorized Officer:	
Telephone number of Authorized Officer:	
Study Area Code of Reporting Carrier:	Filing Due Date for this form:
Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.	

Certification - Agent / Carrier Data Collection Form	FCC Form 481 OMB Control No. 3060-0988 OMB Control No. 3060-0819 July 2013
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<010> Study Area Code	432017
<015> Study Area Name	PINE TELEPHONE CO
<020> Program Year	2016
<030> Contact Name - Person USAC should contact regarding this data	JANE MERZ
<035> Contact Telephone Number - Number of person identified in data line <030>	5805843355 ext.
<039> Contact Email Address - Email Address of person identified in data line <030>	jane@pinetelephone.com

TO BE COMPLETED BY THE REPORTING CARRIER, IF AN AGENT IS FILING ANNUAL REPORTS ON THE CARRIER'S BEHALF.

Certification of Officer to Authorize an Agent to File Annual Reports for CAF or LI Recipients on Behalf of Reporting Carrier	
I certify that (Name of Agent) <u>Tom Karalis</u> is authorized to submit the information reported on behalf of the reporting carrier. I also certify that I am an officer of the reporting carrier; my responsibilities include ensuring the accuracy of the annual data reporting requirements provided to the authorized agent; and, to the best of my knowledge, the reports and data provided to the authorized agent is accurate.	
Name of Authorized Agent:	Tom Karalis
Name of Reporting Carrier:	PINE TELEPHONE CO
Signature of Authorized Officer:	CERTIFIED ONLINE Date: 06/29/2015
Printed name of Authorized Officer:	Esta Callahan
Title or position of Authorized Officer:	President
Telephone number of Authorized Officer:	5805842100 ext.
Study Area Code of Reporting Carrier:	432017 Filing Due Date for this form: 07/01/2015
Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C § 1001.	

TO BE COMPLETED BY THE AUTHORIZED AGENT:

Certification of Agent Authorized to File Annual Reports for CAF or LI Recipients on Behalf of Reporting Carrier	
I, as agent for the reporting carrier, certify that I am authorized to submit the annual reports for universal service support recipients on behalf of the reporting carrier; I have provided the data reported herein based on data provided by the reporting carrier; and, to the best of my knowledge, the information reported herein is accurate.	
Name of Reporting Carrier:	PINE TELEPHONE CO
Name of Authorized Agent or Employee of Agent:	TOM KARALIS
Signature of Authorized Agent or Employee of Agent:	CERTIFIED ONLINE Date: 06/29/2015
Printed name of Authorized Agent or Employee of Agent:	TOM KARALIS
Title or position of Authorized Agent or Employee of Agent:	CONSULTANT
Telephone number of Authorized Agent or Employee of Agent:	9182981618 ext.
Study Area Code of Reporting Carrier:	432017 Filing Due Date for this form: 07/01/2015
Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C § 1001.	

Attachments

<703>

[illegible]

<010>	Study Area Code	432017
<015>	Study Area Name	PINE TELEPHONE CO
<020>	Program Year	2016
<030>	Contact Name - Person USAC should contact regarding this data	JANE MERE
<035>	Contact Telephone Number - Number of person identified in data line <030>	5805843355 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	jane@pinetelephone.com

[illegible]

[illegible]

PINE TELEPHONE COMPANY, INC.
FIVE-YEAR QUALITY IMPROVEMENT PLAN
(USAC DOCUMENT - 432017OK112.PDF)

Company Name: Pine Telephone Company

Company Headquarters: Broken Bow, Oklahoma

Narrative

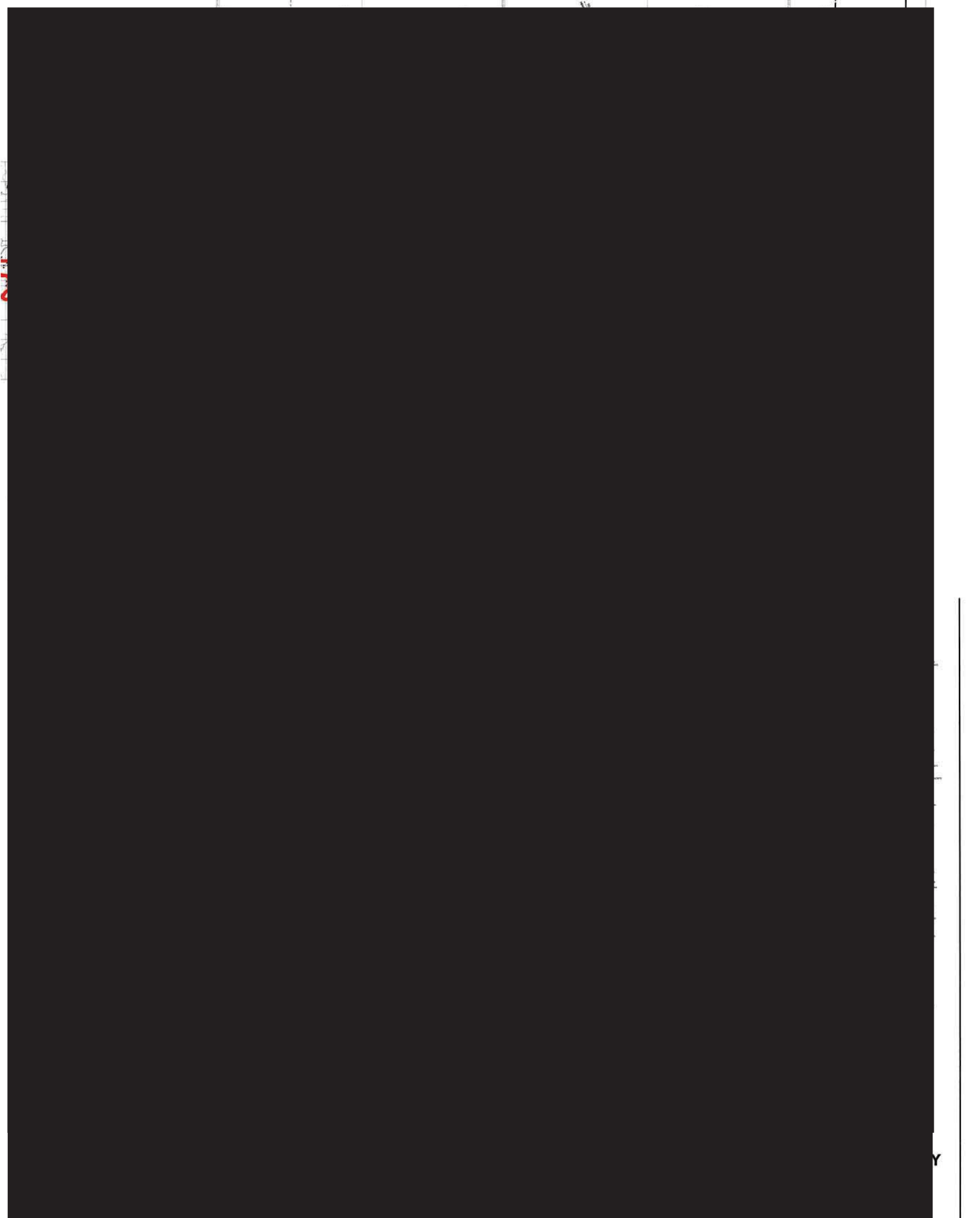


Universal Service Support Received



REDACTED - FOR PUBLIC INSPECTION





REDACTED - FOR PUBLIC INSPECTION



PINE TELEPHONE COMPANY, INC.

QUALITY OF SERVICE AND CUSTOMER PROTECTION PROCESS

(USAC DOCUMENT - 432017OK510.PDF)

PINE TELEPHONE

QUALITY OF SERVICE & CUSTOMER PROTECTION PROCESSES

1. **Available Customer Service Representatives to Answer Phones** – All calls received by PINE TELEPHONE during business hours are answered by the third ring. When the assigned customer representatives are unable to answer calls by the third ring, additional representatives are available to help answer phones.
2. **Provide After Hours Emergency Customer Service** – Calls are answered by voice mail. Call logs are reviewed daily by personnel. Customer service representatives have been given a list of questions by PINE TELEPHONE to ask to assist them in resolving any issues. Unresolved issues are reviewed the following work day. Issues requiring immediate attention are sent to the PINE TELEPHONE service technician on call, who works to resolve the matter as quickly as possible. If that technician is unable to resolve the problem, additional technicians are called. After-hours customer service is also available.
3. **Provide a 8 am to 8 pm 6 days a week Hour Internet Help Desk Service** – All calls are answered within 60 seconds. Call logs are reviewed daily by personnel with Managers available to review and address any issues.
4. **Online Bill Payments** – Payments made online are posted to the customer accounts and are viewable on the online customer account summaries within 24 hours. Any encountered problems are reported to the Office Supervisor, and resolved as quickly as possible.
5. **Give Customers Cut-off Warnings-** Notification of the payment due date and the cut-off date are prominently displayed on bills. Customers in danger of losing service will receive a notification to remind them of the late payment. If a customer complains that notice was not given, they are directed to speak with the Office Manager who will work to resolve the matter and prevent it from occurring again. Account balance reports are printed monthly internally using the company's billing system.
6. **Ensure That All New Service Installation Orders Are Fulfilled Promptly** – All customers are contacted regarding scheduling the new service installation. If outside plant is already in place, fill the order at the customers' earliest convenience; if outside plant is in not in place, fill the order as soon as the weather permits.
7. **Minimize Customer Downtime for Services & Make Requested Changes Promptly** – Contact customers regarding all service requests, with a goal of resolving all issues within 48 hours. Any unresolved issues will be resolved contingent on the technician/customer coordination of access to the premises.

8. **Proactively Monitoring in Case of Major Service Outages** – Service technicians will be made aware of outages affecting customers within an hour. It is the goal of PINE TELEPHONE to resolve major outages in four hours or less. If an outage has not been resolved within four hours, technicians will begin utilizing all resources, both from within and from without. Technicians establish and accomplish yearly training goals to be better equipped for managing all services.

CUSTOMER PRIVACY

Company Confidential Information Policy – PINE TELEPHONE has a company policy in place that holds employees accountable for a breach of confidentiality concerning customer data and company information. The policy states: "You are reminded that revealing any type of confidential information to unauthorized persons or tampering with or altering company records and/or property is a violation of trust that can result in disciplinary action up to and including discharge."

Company CPNI Policy – PINE TELEPHONE also has a Customer Proprietary Network Information (CPNI) policy in place that ensures employee compliance with the FCC's CPNI guidelines. Outlined within the policy is a detailed description of CPNI as well as both acceptable and unacceptable CPNI practices. Employees are required to sign waivers stating they understand and agree to comply with the policy and acknowledge that "failure to protect this information result in disciplinary action up to and including discharge for the responsible employee." As a part of this policy, PINE TELEPHONE has designated a Compliance Officer responsible for training employees, monitoring CPNI related activities, and reporting breaches.

PINE TELEPHONE COMPANY, INC.

EMERGENCY SITUATION FUNCTIONALITY – AVAILABILITY OF BACK UP POWER

(USAC DOCUMENT - 432017OK610.PDF)

PINE TELEPHONE EMERGENCY SITUATION FUNCTIONALITY AVAILABILITY OF BACK-UP POWER

PINE TELEPHONE has 1 central office and 1 tandem office located within its service area. Each of these locations is equipped with a back-up generator capable of providing power to the equipment within that office in the event of an external power source outage. After each power outage, generators are inspected and are also professionally serviced bi-annually to ensure functionality.

TRAFFIC ROUTING

Voice traffic between the central office switch and remote DLC's is carried across fiber optic cable. Voice traffic between the central office switch and the upstream tandem is provisioned across redundant links.

MANAGING TRAFFIC SPIKES

PINE TELEPHONE's careful capacity planning has put multiple constraints and triggers in place on its Central Office equipment, outside plant equipment, and network backbone that will provide the company with the capability of handling traffic spikes during emergency situations.

- Usage rates are analyzed monthly internally by PINE TELEPHONE using reports automatically generated by the switch to ensure that usage does not exceed 80% of total line capacity.
- PINE TELEPHONE will monitor traffic internally on a monthly basis to ensure optimal efficiency.

PINE TELEPHONE COMPANY, INC.

TRIBAL LANDS REPORTING

(USAC DOCUMENT - 432017OK920.PDF)

Esta O. Callaham
President
John B. Callaham
Chairman of Board
Angela Whisenhunt
Secretary/Treasurer



Jerry Whisenhunt
*Plant Manager &
Board Member*
Biff Toel
*Vice President &
Assistant Plant Manager*

December 5, 2013

Chief Pyle,

Pine Telephone Company, Inc. is a rural independent telephone company providing service to approximately 5,000 customers in McCurtain, and Pushmataha counties in Southeast Oklahoma. This includes a number of exchanges and customers in the Choctaw and Chickasaw. Pine offers landline phone service, high speed internet, and long distance as well as opportunities to bundle services together.

Pine currently provides service to several local community anchor institutions. Most of these, while not receiving a discount for phone service, do receive a free or discounted rate for high speed internet. This partnership allows the institutions the ability to have connectivity worldwide and to offer services to the community at each location. Pine believes that anchor institutions such as community centers, fire stations and city halls are an integral part of the community and provide countless benefits and gathering places to area residents. Pine has the ability to provide service upon reasonable request to anyone in its service area including Tribal community anchor institutions.

Pine is currently deploying high speed internet and fiber to the home service in order to provide service and coverage to an increasing customer base. Through various partnerships and location of its service territory, Pine has the ability to offer ever increasing internet speeds at competitive prices. These speeds will allow for the streaming of video, opportunities for telemedicine, offsite workplaces and remote study opportunities for education. These will allow for the growth of connectivity in a rural landscape granting customers to be ever more connected to the retail environments of urban areas.

Pine also provides Lifeline service in its study areas and to customers that qualify under state and federal guidelines. Only those qualifying for Lifeline and residing on federally recognized Tribal Lands qualify for Link-Up. It can only be used for activating new phone service or activating existing service in a new location. Pine also offers toll limitation service which helps households save money by blocking toll calls from being made, thus preventing costly long distance bills.

Should you have any questions or concerns about Pine services or offerings, or if you should have any concerns that you would like to see Pine address, please do not hesitate to contact me.

Sincerely,

PINE TELEPHONE COMPANY, INC.
VOICE SERVICES RATE COMPARABILITY
(USAC DOCUMENT - 432017OK1010)

Voice Services Rate Comparability

Pine Telephone Company

In compliance with the 54.313 Rules, Pine Telephone Company must certify that its current rate for fixed voice services is no more than two standard deviations above the national average urban rate for voice service.

According to the 2015 Urban Rate Survey conducted by the FCC's Wireline Competition Bureau, the weighted average unlimited local rate is \$21.22. USAC Guidelines provide that two standard deviations above the \$21.22 would be \$47.48.

The rates for Pine Telephone Company shown on the Voice Pricing Form (0700) are below \$47.48.

Consequently, Pine Telephone Company meets the above mentioned requirement.

PINE TELEPHONE COMPANY, INC.

LIFELINE PLAN

(USAC DOCUMENT - 432017OK1210.PDF)

Pine Telephone Company

Lifeline Plan – Oklahoma

Pine Telephone Company, Inc. (Pine) offers Lifeline Telephone Service to its customers. The eligibility criteria for Lifeline service is indicated on the attachment. Upon confirmation of eligibility, appropriate lifeline credits are provided to the customer. Oklahoma also qualifies for an additional credit that may not exceed \$25.00 for Tribal Lands. The rate for basic local exchange service for Pine customers in Oklahoma is \$16.75. The FCC Rules specify that the basic local exchange service charges net of lifeline credits can't be lower than \$1.00. Since, the total lifeline credits available in Oklahoma exceed the rate charged for basic local exchange service, the lifeline eligible customer pays \$1.00 for basic local exchange service. Pine customers receive unlimited local calling as part of the Basic Local Exchange Service Plan.

No other credits are applied to rates for remaining services, including toll service (if the customer doesn't have toll limitation service). Toll services are assessed at rates charged by the customers prescribed long distance provider.

Federal Poverty Guideline Certification Form
Page 1 of 2

I certify that all the income actually received by all members of my household is less than or equal to 135% of the federal poverty level, as set forth below. I understand a "household" is any individual or group of individuals who live together at the same address and share income and expenses. I have provided the documentation verifying the income in the categories checked below to Pine Telephone in support of my application for Lifeline/LinkUp discounted service. I certify that there are ____ members of my household living with me at the address listed below. I also certify that I will notify Pine Telephone within 30 days if my household income exceeds 135% of the Federal Poverty Guidelines. I further certify that the Company representative returned all my documentation to me. I make these certifications under penalty of perjury, punishable by law.

Print Name of applicant: _____

Phone#: _____

Home Address: _____

Signed: _____ Date: _____

Federal law at 47 C.F.R. §54.400(f) has defined "income" for purposes of eligibility for Lifeline Assistance as all income actually received by all members of the household and includes the following. Please check all the categories of "income" that members of your household currently receive.

- _____ Salary before deductions for taxes
- _____ Public Assistance benefits
- _____ Social Security payments
- _____ Pensions
- _____ Unemployment compensation
- _____ Veteran's Benefits
- _____ Inheritances
- _____ Alimony
- _____ Child Support Payments
- _____ Worker's Compensation Benefits
- _____ Gifts
- _____ Lottery Winnings
- _____ Other _____

135% of the 2013 federal poverty level guidelines are as follows:

Persons In Household ----- Annual household income no higher than:

1 -----	\$15,755
2 -----	\$21,236
3 -----	\$26,717
4 -----	\$32,198
5 -----	\$37,679
6 -----	\$43,160
7 -----	\$48,641
8 -----	\$54,122

(For each additional person, add: \$5,481)

1 The only exceptions to "income" are student financial aid, military housing and cost-of-living allowances, irregular income from occasional small jobs such as baby-sitting or lawn mowing, and the like.

2 This information is regularly updated by the Federal Government.

For Company Use Only

Name of Employee Who Reviewed Income Documentation: _____

Type of Income Documentation received from applicant: _____

**PINE TELEPHONE
LIFELINE/LINK UP AMERICA ON TRIBAL LANDS PROGRAM
AUTHORIZATION AND CERTIFICATION FORM**

THE BENEFITS YOU RECEIVE UNDER THE ENHANCED LIFELINE/LINKUP PROGRAM WILL TERMINATE ON JUNE 1, 2014, UNLESS YOU COMPLETE ANOTHER AUTHORIZATION AND CERTIFICATION FORM WITHIN THIRTY DAYS OF MAY 1, 2014, AND RETURN IT TO PINE TELEPHONE.

A. YOU MUST MEET PROGRAM PARTICIPATION REQUIREMENTS OR HOUSEHOLD INCOME REQUIREMENTS

1. I hereby certify that I participate in at least one of the following programs (CHECK ALL THAT APPLY) OR my household income is at or less than 135% of the federal poverty level:

- ☐ Supplemental Nutrition Assistance Program (SNAP a/k/a Food Stamps)
- ☐ Temporary Assistance for Needy Families (TANF)
- ☐ Supplemental Security Income (SSI)
- ☐ Medical Assistance (Medicaid/SoonerCare)
- ☐ Vocational Rehabilitation (including aid to the hearing impaired)
- ☐ Oklahoma Sales Tax Relief
- ☐ Food Distribution Program on Indian Reservations ("FDPIR")
- ☐ Federal Public Housing
- ☐ Low Income Energy Assistance Program
- ☐ Bureau of Indian Affairs General Assistance;
- ☐ Temporary Assistance for Needy Families (TANF) Tribally-administered block grant programs;
- ☐ Head Start Programs (only applicant or customer who satisfy the income qualifying eligibility provision);
- ☐ National School Lunch Program (only applicant or customer who satisfy the income standard of the program for free meals).

OR;

☐ My household income is at or less than 135% of the federal poverty level. There are ____ individuals in my household. Customer must provide sufficient proof of income as set forth in 47 CFR §54.400(f).

B. YOU MUST MEET THE "ONE PER HOUSEHOLD" REQUIREMENT

- **ONLY ONE PERSON IN A HOUSEHOLD CAN QUALIFY TO RECEIVE PROGRAM BENEFITS.**
- **A "HOUSEHOLD" IS ANY INDIVIDUAL OR GROUP OF INDIVIDUALS WHO LIVE TOGETHER AT THE SAME ADDRESS AND SHARE INCOME AND EXPENSES.**
- **ONLY ONE RESIDENCE TELEPHONE SERVICE IN A HOUSEHOLD CAN RECEIVE PROGRAM SUPPORT.**
- **A HOUSEHOLD MAY NOT RECEIVE LIFELINE/LINKUP BENEFITS FROM MULTIPLE SERVICE PROVIDERS.**

____ *My initials here certify that my household meets the one-per-household requirement. I understand that falsely certifying eligibility is a violation of the rules of the Federal Communications Commission and will result in my removal from the Lifeline/LinkUp Program and could result in criminal prosecution by the United States government.*

Do you live at an address at which there are multiple households (for example, a nursing home or group home)?

- ☐ **Yes (If yes, you must complete a supplemental form to determine your eligibility.)**
☐ **No**

C. YOU MUST ACKNOWLEDGE AND CERTIFY THE FOLLOWING STATEMENTS AND NOTIFICATION OBLIGATIONS (You must read and initial all statements below to acknowledge and certify you understand your obligations.)

_____ I certify that the telephone service location to which this certification applies is my primary/temporary (circle one) residential service address located at _____, and to the best of my knowledge this residential service address is located on former tribal land/reservation (as defined in 25 CFR § 20.1(v)).

_____ I also certify that if the address identified above is a temporary one, I will recertify my temporary residential address every 90 days.

_____ I also certify that if in the future, I no longer live at the address identified above, I will notify Pine Cellular within 30 days.

_____ I also certify that if in the future, I no longer participate in or qualify for at least one of the programs listed in item A.1 above or conditions change in any way, I will notify Pine Cellular within 30 days.

_____ I also certify that I will notify Pine Cellular within 30 days if I no longer live at the address identified above.

_____ I also certify that:

_____ a. The telephone service which I am requesting receipt of Lifeline and/or LinkUp benefits for is listed in my name.

_____ b. I am 18 years of older and am not claimed as a dependent on another person's tax return.

_____ c. The above service address is my primary/temporary residence, not a second home or business.

_____ d. My household will receive only one Lifeline/LinkUp service and, to the best of my knowledge, my household is not already receiving a Lifeline/LinkUp service.

D. YOU MUST ACKNOWLEDGE THE FOLLOWING STATEMENTS (You must read and initial all statements below to acknowledge your understanding of the actions of Pine Cellular you hereby authorize.)

_____ I authorize Pine Cellular or its duly appointed representative to access any records required to verify these statements in order to confirm my continued participation in the above program. I authorize representatives of the above programs to discuss with and/or provide copies to Pine Cellular, if requested by the company, to verify my participation in the above program and my eligibility for "Enhanced" Lifeline or "Expanded" Link Up benefits.

_____ I authorize Pine Cellular to transmit to the Administrator of the National Lifeline Accountability Database my full name, my full residential address, my date of birth, and the last four digits of my Social Security Number or Tribal Identification Number, the telephone number to be associated with Lifeline/LinkUp Program benefits, the date on which Lifeline/LinkUp service is begun, the date on which Lifeline/LinkUp Program benefits end, the amount of support sought by the Company and the means through which I qualify for Program benefits. I understand that transmission of this information is required to ensure the proper administration of the Lifeline/LinkUp Program. I also understand that if I refuse to have this information transmitted to the Administrator, I will be denied Program benefits.

E. CUSTOMER/APPLICANT INFORMATION

Applicant's Name _____

Applicant's Billing Address, if different than identified above _____

Home Phone Number(_____) _____ Work Phone Number(_____) _____

(Your contact number during weekdays between 8 a.m. and 5 p.m.)

Social Security Number (SSN) last four or Tribal identification number if you do not have a SSN: _____

Date of Birth _____

I AFFIRM, UNDER PENALTY OF PERJURY, THAT THE FOREGOING REPRESENTATIONS ARE TRUE AND THAT PROVIDING FALSE OR FRAUDULENT INFORMATION TO RECEIVE LIFELINE/LINKUP BENEFITS IS PUNISHABLE BY LAW.

Signature of benefit recipient

Date

PINE TELEPHONE
Lifeline Household Worksheet

Name _____
Address _____

Telephone Number _____

Lifeline is a government program that provides a monthly discount on home or mobile telephone services. Only ONE Lifeline discount is allowed per household. Members of a household are not permitted to receive Lifeline service from multiple telephone companies.

Your household is everyone who lives together at your address as one economic unit (including children and people who are not related to you).

The adults you live with are part of your economic unit if they contribute to and share in the income and expenses of the household. An adult is any person 18 years of age or older, or an emancipated minor (a person under age 18 who is legally considered to be an adult). Household expenses include food, health care expenses (such as medical bills) and the cost of renting or paying a mortgage on your place of residence (a house or apartment, for example) and utilities (including water, heat and electricity). Income includes salary, public assistance benefits, social security payments, pensions, unemployment compensation, veteran's benefits, inheritances, alimony, child support payments, worker's compensation benefits, gifts, and lottery winnings.

Spouses and domestic partners are considered to be part of the same household. Children under the age of 18 living with their parents or guardians are considered to be part of the same household as their parents or guardians. If an adult has no income, or minimal income, and lives with someone who provides financial support to that adult, both people are considered part of the same household.

You have been asked to complete this Worksheet because someone else currently receives a Lifeline-supported service at your address. This other person may or may not be a part of your household. Answer the questions below to determine whether there is more than one household residing at your address.

1. Does your spouse or domestic partner (that is, someone you are married to or in a relationship with) already receive a Lifeline-discounted phone? (check no if you do not have a spouse or partner) _____YES _____NO

If you checked YES, you may not sign up for Lifeline because someone in your household already receives Lifeline. Only ONE Lifeline discount is allowed per household.

If you checked NO, please answer question #2.

2. Other than a spouse or partner, do other adults (people over the age of 18 or emancipated minors) live with you at your address?

- A. A parent _____YES _____NO D. An adult roommate _____YES _____NO
B. An adult son or daughter _____YES _____NO E. Other _____YES _____NO
C. Another adult relative _____YES _____NO
(such as a sibling, aunt, cousin, grandparent,
grandchild, etc.)

If you checked NO for each statement above, you do not need to answer the remaining questions. Please initial line B, below, and sign and date the worksheet.

If you checked YES, please answer question #3.

3. Do you share living expenses (bills, food, etc.) and share income (either your income, the other person's income or both incomes together) with at least one of the adults listed above in question #2? _____YES _____NO

If you checked NO, then your address includes more than one household. Please initial lines A and B below, and sign and date the worksheet.

If you checked YES, then your address includes only one household. You may not sign up for Lifeline because someone in your household already receives Lifeline.

CERTIFICATION

Please initial the certifications below and sign and date this worksheet. Submit this worksheet to Pine Telephone along with your Lifeline application.

- A. _____I certify that I live at an address occupied by multiple households.
B. _____I understand that violation of the one-per-household requirement is against the Federal Communication Commission's rules and may result in me losing my Lifeline benefits, and potentially, prosecution by the United States government.

Signature_____ Date_____

Lifeline/Link Up Applicant Enrollment
Eligibility Documentation Review Form

For Company Use Only

Date: _____

Name of Lifeline/Link Up Applicant:

Name of Employee Who Reviewed Eligibility Documentation:

Type of Eligibility Documentation received from applicant and reviewed:

Lifeline Applicant is 18 years of age or older: _____

PINE TELEPHONE COMPANY, INC.

MILESTONE CERTIFICATION

(USAC DOCUMENT - 432017OK3010.PDF)

**Progress Report on 5 Year Plan
Line 3010 - Milestone Certification**

Pine Telephone Company certifies that, upon a reasonable request, it will provide Broadband services at actual speeds of 4Mbps downstream / 1Mbps upstream, with latency suitable for real-time applications, including VoIP and usage capacity that is reasonably comparable to urban areas and that requests for such services are met within a reasonable amount of time.

PINE TELEPHONE COMPANY, INC.
CONSOLIDATED FINANCIAL STATEMENTS
(USAC DOCUMENT - 432017OK3017.PDF)

USDA-RUS		This data will be used by RUS to review your financial situation. Your response is required by 7 U.S.C. 901 et seq. and, subject to federal laws and regulations regarding confidential information, will be treated as confidential.	
OPERATING REPORT FOR TELECOMMUNICATIONS BORROWERS		BORROWER NAME	
		The Pine Telephone Company, Inc. (Prepared with Audited Data)	
INSTRUCTIONS-Submit report to RUS within 30 days after close of the period. For detailed instructions, see RUS Bulletin 1744-2. Report in whole dollars only.		PERIOD ENDING December, 2014	BORROWER DESIGNATION OK0550
CERTIFICATION			
We hereby certify that the entries in this report are in accordance with the accounts and other records of the system and reflect the status of the system to the best of our knowledge and belief.			
ALL INSURANCE REQUIRED BY 7 CFR PART 1788, CHAPTER XVII, RUS, WAS IN FORCE DURING THE REPORTING PERIOD AND RENEWALS HAVE BEEN OBTAINED FOR ALL POLICIES.			
DURING THE PERIOD COVERED BY THIS REPORT PURSUANT TO PART 1788 OF 7CFR CHAPTER XVII (Check one of the following)			
<input type="checkbox"/> All of the obligations under the RUS loan documents have been fulfilled in all material respects.		<input type="checkbox"/> There has been a default in the fulfillment of the obligations under the RUS loan documents. Said default(s) is/are specifically described in the Telecom Operating Report	
_____		_____	
		DATE	

PART A. BALANCE SHEET					
ASSETS	BALANCE PRIOR YEAR	BALANCE END OF PERIOD	LIABILITIES AND STOCKHOLDERS' EQUITY	BALANCE PRIOR YEAR	BALANCE END OF PERIOD
CURRENT ASSETS			CURRENT LIABILITIES		
Cash and Equivalents			25. Accounts Payable		
Cash-RUS Construction Fund			26. Notes Payable		
Affiliates:			27. Advance Billings and Payments		
a. Telecom, Accounts Receivable			28. Customer Deposits		
b. Other Accounts Receivable			29. Current Mat. L/T Debt		
c. Notes Receivable			30. Current Mat. L/T Debt-Rur. Dev.		
Non-Affiliates:			31. Current Mat.-Capital Leases		
a. Telecom, Accounts Receivable			32. Income Taxes Accrued		
b. Other Accounts Receivable			33. Other Taxes Accrued		
c. Notes Receivable			34. Other Current Liabilities		
Interest and Dividends Receivable			35. Total Current Liabilities (25 thru 34)		
Material-Regulated			LONG-TERM DEBT		
Material-Nonregulated			36. Funded Debt-RUS Notes		
Prepayments			37. Funded Debt-RTB Notes		
Other Current Assets			38. Funded Debt-FFB Notes		
Total Current Assets (1 Thru 9)			39. Funded Debt-Other		
NONCURRENT ASSETS			40. Funded Debt-Rural Develop. Loan		
Investment in Affiliated Companies			41. Premium (Discount) on L/T Debt		
a. Rural Development			42. Reacquired Debt		
b. Nonrural Development			43. Obligations Under Capital Lease		
Other Investments			44. Adv. From Affiliated Companies		
a. Rural Development			45. Other Long-Term Debt		
b. Nonrural Development			46. Total Long-Term Debt (36 thru 45)		
Nonregulated Investments			OTHER LIAB. & DEF. CREDITS		
Other Noncurrent Assets			47. Other Long-Term Liabilities		
Deferred Charges			48. Other Deferred Credits		
Jurisdictional Differences			49. Other Jurisdictional Differences		
Total Noncurrent Assets (11 thru 16)			50. Total Other Liabilities and Deferred Credits (47 thru 49)		
PLANT, PROPERTY, AND EQUIPMENT			EQUITY		
Telecom, Plant-in-Service			51. Cap. Stock Outstand. & Subscribed		
Property Held for Future Use			52. Additional Paid-in-Capital		
Plant Under Construction			53. Treasury Stock		
Plant Adj., Nonop. Plant & Goodwill			54. Membership and Cap. Certificates		
Less Accumulated Depreciation			55. Other Capital		
Net Plant (18 thru 21 less 22)			56. Patronage Capital Credits		
TOTAL ASSETS (10+17+23)			57. Retained Earnings or Margins		
			58. Total Equity (51 thru 57)		
			59. TOTAL LIABILITIES AND EQUITY (35+46+50+58)		

Total Equity = 59.53% of Total Assets

USDA-RUS		BORROWER DESIGNATION	
OPERATING REPORT FOR TELECOMMUNICATIONS BORROWERS		OK0550	
		PERIOD ENDING	
INSTRUCTIONS- See RUS Bulletin 1744-2		December, 2014	
PART B. STATEMENTS OF INCOME AND RETAINED EARNINGS OR MARGINS			
ITEM		PRIOR YEAR	THIS YEAR
1. Local Network Services Revenues			
2. Network Access Services Revenues			
3. Long Distance Network Services Revenues			
4. Carrier Billing and Collection Revenues			
5. Miscellaneous Revenues			
6. Uncollectible Revenues			
7. Net Operating Revenues (1 thru 5 less 6)			
8. Plant Specific Operations Expense			
9. Plant Nonspecific Operations Expense (Excluding Depreciation & Amortization)			
10. Depreciation Expense			
11. Amortization Expense			
12. Customer Operations Expense			
13. Corporate Operations Expense			
14. Total Operating Expenses (8 thru 13)			
15. Operating Income or Margins (7 less 14)			
16. Other Operating Income and Expenses			
17. State and Local Taxes			
18. Federal Income Taxes			
19. Other Taxes			
20. Total Operating Taxes (17+18+19)			
21. Net Operating Income or Margins (15+16-20)			
22. Interest on Funded Debt			
23. Interest Expense - Capital Leases			
24. Other Interest Expense			
25. Allowance for Funds Used During Construction			
26. Total Fixed Charges (22+23+24-25)			
27. Nonoperating Net Income			
28. Extraordinary Items			
29. Jurisdictional Differences			
30. Nonregulated Net Income			
31. Total Net Income or Margins (21+27+28+29+30-26)			
32. Total Taxes Based on Income			
33. Retained Earnings or Margins Beginning-of-Year			
34. Miscellaneous Credits Year-to-Date			
35. Dividends Declared (Common)			
36. Dividends Declared (Preferred)			
37. Other Debits Year-to-Date			
38. Transfers to Patronage Capital			
39. Retained Earnings or Margins End-of-Period [(31+33+34) - (35+36+37+38)]			
40. Patronage Capital Beginning-of-Year			
41. Transfers to Patronage Capital			
42. Patronage Capital Credits Retired			
43. Patronage Capital End-of-Year (40+41-42)			
44. Annual Debt Service Payments			
45. Cash Ratio [(14+20-10-11) / 7]			
46. Operating Accrual Ratio [(14+20+26) / 7]			
47. TIER [(31+26) / 26]			
48. DSCR [(31+26+10+11) / 44]			

OPERATING REPORT FOR TELECOMMUNICATIONS BORROWERS

INSTRUCTIONS - See RUS Bulletin 1744-2

BORROWER DESIGNATION
OK0550

PERIOD ENDED
December, 2014

Part C. SUBSCRIBER (ACCESS LINE), ROUTE MILE, & HIGH SPEED DATA INFORMATION

EXCHANGE	1. RATES		2. SUBSCRIBERS (ACCESS LINES)			3. ROUTE MILES	
	B-1	R-1	BUSINESS	RESIDENTIAL	TOTAL	TOTAL (including fiber)	FIBER
	(a)	(b)	(a)	(b)	(c)	(a)	(b)
Broken Bow							
Eagletown							
Hochatown							
Oak Hill							
Wright City							
MobileWireless							
Route Mileage Outside Exchange Area							
Total							
No. Exchanges							

REDACTED - FOR PUBLIC INSPECTION

OPERATING REPORT FOR TELECOMMUNICATIONS BORROWERS

INSTRUCTIONS - See RUS Bulletin 1744-2

BORROWER DESIGNATION
OK0550

PERIOD ENDED
December, 2014

Part C. SUBSCRIBER (ACCESS LINE), ROUTE MILE, & HIGH SPEED DATA INFORMATION

4. BROADBAND SERVICE

Details on Least Expensive Broadband Service

EXCHANGE	No. Access Lines with BB available (a)	No Of Broadband Subscribers (b)	Number Of Subscribers (c)	Advertised Download Rate (Kbps) (d)	Advertised Upload Rate (Kbps) (e)	Price Per Month (f)	Standalone/Pckg (f)	Type Of Technology (g)
Broken Bow								
Eagletown								
Hochatown								
Oak Hill								
Wright City								
Total								

REDACTED - FOR PUBLIC INSPECTION

USDA-RUS OPERATING REPORT FOR TELECOMMUNICATIONS BORROWERS			BORROWER DESIGNATION OK0550 PERIOD ENDING December, 2014		
INSTRUCTIONS- See RUS Bulletin 1744-2					
PART D. SYSTEM DATA					
1. No. Plant Employees	2. No. Other Employees	3. Square Miles Served	4. Access Lines per Square Mile	5. Subscribers per Route Mile	
PART E. TOLL DATA					
1. Study Area ID Code(s) a. 201700 b. _____ c. _____ d. _____ e. _____ f. _____ g. _____ h. _____ i. _____ j. _____		2. Types of Toll Settlements (Check one) <div style="display: flex; justify-content: space-between;"> <div> Interstate: <input type="checkbox"/> Average Schedule Intrastate: <input type="checkbox"/> Average Schedule </div> <div> <input checked="" type="checkbox"/> Cost Basis <input checked="" type="checkbox"/> Cost Basis </div> </div>			
PART F. FUNDS INVESTED IN PLANT DURING YEAR					
1. RUS, RTB, & FFB Loan Funds Expended					
2. Other Long-Term Loan Funds Expended					
3. Funds Expended Under RUS Interim Approval					
4. Other Short-Term Loan Funds Expended					
5. General Funds Expended (Other than Interim)					
6. Salvaged Materials					
7. Contribution in Aid to Construction					
8. Gross Additions to Telecom. Plant (1 thru 7)					
PART G. INVESTMENTS IN AFFILIATED COMPANIES					
INVESTMENTS <i>(a)</i>	CURRENT YEAR DATA		CUMULATIVE DATA		
	Investment This Year <i>(b)</i>	Income/Loss This Year <i>(c)</i>	Cumulative Investment To Date <i>(d)</i>	Cumulative Income/Loss To Date <i>(e)</i>	Current Balance <i>(f)</i>
1. Investment in Affiliated Companies - Rural Development					
2. Investment in Affiliated Companies - Nonrural Development					

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PART H. CURRENT DEPRECIATION RATES

Are corporation's depreciation rates approved by the regulatory authority with jurisdiction over the provision of telephone services? (Check one)

☐ YES
☒ NO

EQUIPMENT CATEGORY	DEPRECIATION RATE
1. Land and support assets - Motor Vehicles	
2. Land and support assets - Aircraft	
3. Land and support assets - Special purpose vehicles	
4. Land and support assets - Garage and other work equipment	
5. Land and support assets - Buildings	
6. Land and support assets - Furniture and Office equipment	
7. Land and support assets - General purpose computers	
8. Central Office Switching - Digital	
9. Central Office Switching - Analog & Electro-mechanical	
10. Central Office Switching - Operator Systems	
11. Central Office Transmission - Radio Systems	
12. Central Office Transmission - Circuit equipment	
13. Information origination/termination - Station apparatus	
14. Information origination/termination - Customer premises wiring	
15. Information origination/termination - Large private branch exchanges	
16. Information origination/termination - Public telephone terminal equipment	
17. Information origination/termination - Other terminal equipment	
18. Cable and wire facilities - Poles	
19. Cable and wire facilities - Aerial cable - Metal	
20. Cable and wire facilities - Aerial cable - Fiber	
21. Cable and wire facilities - Underground cable - Metal	
22. Cable and wire facilities - Underground cable - Fiber	
23. Cable and wire facilities - Buried cable - Metal	
24. Cable and wire facilities - Buried cable - Fiber	
25. Cable and wire facilities - Conduit systems	
26. Cable and wire facilities - Other	

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INSTRUCTIONS – See help in the online application.	

PART I – STATEMENT OF CASH FLOWS	
1. Beginning Cash (Cash and Equivalents plus RUS Construction Fund)	
CASH FLOWS FROM OPERATING ACTIVITIES	
2. Net Income	
Adjustments to Reconcile Net Income to Net Cash Provided by Operating Activities	
3. Add: Depreciation	
4. Add: Amortization	
5. Other (Explain)	
Changes in Operating Assets and Liabilities	
6. Decrease/(Increase) in Accounts Receivable	
7. Decrease/(Increase) in Materials and Inventory	
8. Decrease/(Increase) in Prepayments and Deferred Charges	
9. Decrease/(Increase) in Other Current Assets	
10. Increase/(Decrease) in Accounts Payable	
11. Increase/(Decrease) in Advance Billings & Payments	
12. Increase/(Decrease) in Other Current Liabilities	
13. Net Cash Provided/(Used) by Operations	
CASH FLOWS FROM FINANCING ACTIVITIES	
14. Decrease/(Increase) in Notes Receivable	
15. Increase/(Decrease) in Notes Payable	
16. Increase/(Decrease) in Customer Deposits	
17. Net Increase/(Decrease) in Long Term Debt (Including Current Maturities)	
18. Increase/(Decrease) in Other Liabilities & Deferred Credits	
19. Increase/(Decrease) in Capital Stock, Paid-in Capital, Membership and Capital Certificates & Other Capital	
20. Less: Payment of Dividends	
21. Less: Patronage Capital Credits Retired	
22. Other (Explain) Misc audit adjustments	
23. Net Cash Provided/(Used) by Financing Activities	
CASH FLOWS FROM INVESTING ACTIVITIES	
24. Net Capital Expenditures (Property, Plant & Equipment)	
25. Other Long-Term Investments	
26. Other Noncurrent Assets & Jurisdictional Differences	
27. Other (Explain)	
28. Net Cash Provided/(Used) by Investing Activities	
29. Net Increase/(Decrease) in Cash	
30. Ending Cash	

Revision Date 2010

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INSTRUCTIONS - See RUS Bulletin 1744-2	PERIOD ENDED December, 2014
NOTES TO THE OPERATING REPORT FOR TELECOMMUNICATIONS BORROWERS	

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INSTRUCTIONS - See RUS Bulletin 1744-2	PERIOD ENDED December, 2014
CERTIFICATION LOAN DEFAULT NOTES TO THE OPERATING REPORT FOR TELECOMMUNICATIONS BORROWERS	